

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)
)
) CRIM NO. 2:21-CR-310
V.)
)
DAVID ABELL , Defendant)

DEFENDANT DAVID ABELL'S MOTION TO CONTINUE SENTENCING

To the Honorable C. Darnell Jones, II, Judge of the Said Court: For the reasons set forth below, Defendant David Abell, by and through his counsel, Evan T.L. Hughes, Esq., respectfully requests that the Court grant a continuance in this matter and avers as follows:

1. Mr. Abell's sentencing is scheduled for March 28, 2022 at 10:00 AM.
2. Undersigned counsel is also attached for a homicide jury trial starting on the same day.
3. Initially, it was unclear whether the homicide trial was going to be proceeding forward, but the most recent information is that it will be proceeding as planned on March 28th, resulting in this motion coming forth at this time.
4. Undersigned counsel will be unable to appear for the instant hearing as a result of the homicide jury trial.
5. The Government does not object to this request.
6. It is within the interests of justice that this continuance request be granted.

WHEREFORE, Defendant, David Abell, respectfully requests this Honorable Court grant his request for continuance.

RESPECTFULLY SUBMITTED:

/s_____

Evan T.L. Hughes, Esq.
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ORDER

AND NOW, this _____ day of _____ 2022, upon consideration of Defendant's Motion to Continue Sentencing, it is hereby ORDERED that Defendant's Motion is GRANTED.

BY THE COURT:

HONORABLE C. DARNELL JONES, II
United States District Judge

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VERIFICATION

All statements in the foregoing pleading are made to the best of counsel's information and belief and are made subject to penalties of perjury.

DATE: March 10, 2022

By:

/s _____
Evan T.L. Hughes, Esq.
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AFFIDAVIT OF SERVICE

I hereby certify that the original of the foregoing Motion to Continue has been filed electronically and served upon all parties of record through ECF.

DATE: March 10, 2022

By:

/s _____
Evan T.L. Hughes, Esq.
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